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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

RICK WOODS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:11-cv-1263-EJD (VKD)

**PLAINTIFF RENE CABRERA'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE REPLY IN
FURTHER SUPPORT OF MOTION
FOR RECONSIDERATION**

[Civil Local Rule 7-11]

Pursuant to Civil Local Rule 7-11, Plaintiff Rene Cabrera ("Cabrera") hereby seeks leave to file Plaintiff Rene Cabrera's Reply in Further Support of Motion for Reconsideration ("Reply"). The proposed brief is attached as Exhibit A to the Declaration of Margaret E. Mazzeo ("Mazzeo Declaration") filed herewith.

On February 26, 2019, the Court issued an Order Granting in Part and Denying in Part Defendant's Motion to Dismiss (Dkt. 480) ("Dismissal Order"). On March 7, 2019, Plaintiff Cabrera filed his Motion for Leave to File Motion for Reconsideration (Dkt. 495) of the Dismissal Order.

On March 7, 2019, the Court entered an Order Granting Plaintiff Cabrera's Motion for Leaving to File Motion for Reconsideration and permitting Google to file and serve a response by no later than April 8, 2019 (Dkt. 498).

On April 8, 2019, Google filed its Opposition to Plaintiff Cabrera's Motion (Dkt. 505) ("Opposition"). Through this Opposition, Google requests that the Court deny Cabrera's Motion. *Id.*

Good cause exists to grant Plaintiff's request for leave to file his Reply because Cabrera has not been afforded an opportunity to address the points and arguments that Google raises in its Opposition. *See* Civil Local Rule 7-3(c) (providing that moving party shall file a reply brief not more than 7 days after opposition brief was due).

As set forth in the Mazzeo Declaration, Plaintiff sent Google a proposed stipulation whereby Google would consent to this motion. However, Google did not agree to enter into this stipulation.

For the reasons set forth above, the Court should grant Plaintiff leave to file his Reply.

Dated: April 12, 2019

Respectfully submitted,

/s/ Matthew L. Mustokoff
Matthew L. Mustokoff

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Plaintiff Rene Cabrera*

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 12, 2019.

/s/ Matthew L. Mustokoff

Matthew L. Mustokoff